

EXHIBIT 29

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR,
Plaintiff, Pro Se
3480 Pershing Ln
Washoe Valley, NV 89704
(775) 223-7899
Const2Audit@gmail.com

v.

WASHOE COUNTY, et al.

Case No.: 3:24-cv-00526-ART-CLB

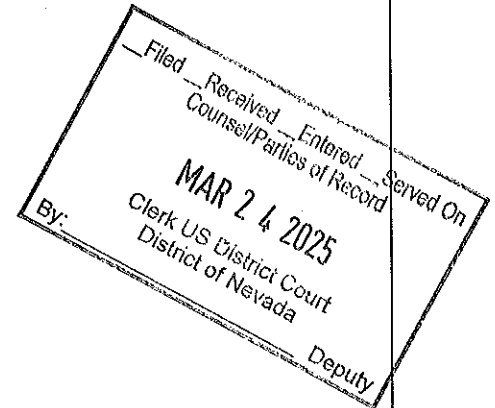


EXHIBIT 29

Title: Video Recording of June 15, 2024, Drag Queen Story Hour at North Valleys Library

Date of Recording: June 15, 2024

Source: Plaintiff's Personal Recording

Format: Digital Video File (MP4) – Submitted on USB/DVD

Bates Number Range: Video 3

DESCRIPTION OF EXHIBIT

PLEADING TITLE - 1

1 This exhibit is a **video recording** of the **June 15, 2024 Drag Queen Story Hour (DQSH)** event
2 at **North Valleys Library**. The footage documents:

- 3 • **Unlawful public access restrictions** imposed by Washoe County Library officials.
- 4 • **Trespassing orders issued without legal justification** in a public space.
- 5 • **Library staff acting outside their authority** to enforce policies beyond their legal
6 jurisdiction.
- 7 • **Assault against Plaintiff by Washoe County Librarian Thanh Nguyen.**
- 8
- 9

10 11 12 **TIMELINE OF INCIDENTS CAPTURED**

13 14 **I. Unlawful Public Access Restrictions & Trespassing by Library Staff**

- 15 • **T/S 0:04:08** – Library Manager **Jonnica Bowen** and Assistant Director **Stacy McKenzie**
16 enforcing Library “code of conduct” **in the strip mall parking lot**, an area outside the
17 library’s jurisdiction.
- 18 • **T/S 0:05:30** – Library Manager **Jonnica Bowen** **trespasses** an individual from the
19 **public parking lot**, which is not under library control.
- 20 • **T/S 0:12:15** – Library Manager **Jonnica Bowen** **trespasses Fred Myer** from the public
21 parking lot without articulable suspicion.
- 22 • **T/S 0:13:35** – Library Manager **Jonnica Bowen** **orders Plaintiff** to move to another
23 location to film, restricting his right to record a **public event in a public space.**
- 24
- 25
- 26

27 28 **II. Police Response & Confirmation of Plaintiff’s Right to Access the Library**

- 1 • **T/S 0:15:21 – Reno Police arrive** at the North Valleys Library in response to calls from
- 2 library staff.
- 3 • **T/S 1:01:06 – Reno Police Sergeant Catalano confirms that Plaintiff has the legal**
- 4 **right** to enter the library once it opens to the public.
- 5 • **T/S 1:09:01 – Plaintiff checks the posted library hours** to confirm that the library is
- 6 scheduled to be open to the public.
- 7 • **T/S 1:09:07 – Plaintiff puts his hand on the right-side entry door and finds it locked,**
- 8 while placing his left foot into the opening of the left-side entry door.
- 9
- 10

11 **III. Assault Against Plaintiff by Librarian Thanh Nguyen**

- 12
- 13 • **T/S 1:09:11 – Washoe County Librarian Thanh Nguyen physically assaults Plaintiff**
- 14 by forcefully **yanking the library door shut 3 times on Plaintiff** while yelling “NO,”
- 15 causing **injury to Plaintiff’s leg.**
- 16 • **Video confirms** Plaintiff was lawfully attempting to enter the library, and Nguyen’s
- 17 **physical force was unprovoked and unjustified, constituting assault and battery**
- 18 **under NRS 200.481.**
- 19
- 20

21 **RELEVANCE TO THE CASE**

22 **✓ First Amendment Violations**

- 23
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- 25 • **Plaintiff’s right to document public events was unlawfully restricted.**
- 26
- 27 • **Selective enforcement of trespass policies to suppress Plaintiff’s speech.**
- 28

- **Library officials denied Plaintiff entry despite Reno Police confirming his right to enter.**

✓ Fourth Amendment Violations

- **Plaintiff and others were unlawfully trespassed from a public parking lot.**
- **Washoe County Library employees acted beyond their legal authority.**

✓ Assault & Battery (NRS 200.481) – Thanh Nguyen’s Physical Attack on Plaintiff

- **Plaintiff suffered physical injury due to Nguyen’s intentional and aggressive conduct.**
- **The video provides indisputable evidence of the assault.**

✓ Refutes BOC’s Motion to Dismiss – Establishes State Actor Nexus

- **Library officials—not private actors—enforced the trespassing orders.**
- **Establishes state action under *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982).**

✓ Supports Monell Liability – Systematic Constitutional Violations by Washoe County

- **Pattern of unconstitutional policies and deliberate retaliation against Plaintiff.**
- **Confirms County’s liability under *Monell v. Dep’t of Soc. Servs.*, 436 U.S. 658 (1978).**

1 **CERTIFICATION & SIGNATURE**

2
3 I, **Drew J. Ribar**, certify that the attached Exhibit 29 is a **true and correct copy** of video
4 evidence submitted in support of Plaintiff's **First Amended Complaint**.
5

6 Dated: **March 17, 2025**

7 **Respectfully Submitted,**

8 **/s/ Drew J. Ribar**
9 **Drew J. Ribar, Pro Se**
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